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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOUGLAS LEE THAYER,

Defendant.

Case No. 2:21-cr-00053-GMN-VCF

Stipulation for Protective Order

The parties, by and through the undersigned, respectfully request that the Court issue an order protecting from disclosure to the public, or any third party not directly related to this case, any documents, recordings, or other tangible things produced by the government during discovery that contain the confidential non-public information. The parties state as follows:

1. The discovery to be produced in connection with this case contains confidential non-public information, including information of third parties.
2. In order to protect the privacy of the individuals referenced in the discovery, the parties intend to restrict access to the following individuals: attorneys for all parties, and

1 any personnel that the attorneys for all parties consider necessary to assist in performing
2 that attorney's duties in the prosecution or defense of this case, including investigators,
3 paralegals, retained experts, support staff, interpreters, and any other individuals
4 specifically authorized by the Court (collectively, the "Covered Individuals").

5 3. The Covered Individuals shall be advised of the Protective Order, and,
6 without leave of Court, the Covered Individuals shall not:

- 7 a. make copies for, or allow copies of any kind to be made by any other
8 person of the Protected Information in this case;
- 9 b. unless as otherwise provided in this agreement, allow any other
10 person to read, listen, or otherwise review the Protected Information
11 in this case;
- 12 c. use the Protected Information for any purpose other than preparing to
13 defend against the charges in this case; or
- 14 d. attach any Protected Information to any of the pleadings, briefs, or
15 other court filings except to the extent those pleadings, briefs, or
16 filings are filed under seal or properly compliant with LR IC 6-1.

17 4. Counsel shall not disclose the Protected Information to the Defendant.

18 5. Nothing in this stipulation is intended to restrict the parties' use or
19 introduction of the Protected Information as evidence at trial.

20 6. The parties shall inform any person to whom disclosure may be made
21 pursuant to this order of the existence and terms of this Court's order. The parties reserve
22 the right to seek to modify the terms of this protective order at a later time pursuant to
23 Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need for this protective
24 order cease to exist, on grounds other than a Covered Individual or some other person

1 violating or circumventing its terms, the Government will move expeditiously for its
2 dissolution.

3 7. In the event of an inadvertent disclosure of the Protected Information, the
4 party making or learning of the inadvertent disclosure will immediately:

5 a. Notify the person to whom the disclosure was made that it contains
6 Protected Information subject to a Protective Order;

7 b. Make all reasonable efforts to preclude dissemination or use of the
8 Protected Information by the person to whom disclosure was
9 inadvertently made;

10 c. Notify the Government and other parties of the identity of the person
11 to whom the disclosure was made, the circumstances surrounding the
12 disclosure, and the steps taken to ensure against further
13 dissemination or use of the information; and

14 d. Notify the Court in writing under seal.

15 8. The defense hereby stipulates to this protective order.

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Dated: March 9, 2022

Respectfully submitted,

For the United States:

CHRISTOPHER CHIOU
Acting United States Attorney

s/ Simon F. Kung

Simon F. Kung

Jessica Oliva

Assistant United States Attorneys

For the Defense:

s/ William Brown

William Brown, Esq.

Attorney for Defendant

IT IS SO ORDERED:



HON. CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

3-10-2022

Date